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PRE-APPEAL BRIEF REQUEST FOR REVIEW	Docket Number (Optional) 14950US01				
I hereby certify that this correspondence is being electronically filed with United States Patent and Trademark Office	1	Application Number 10/606,216		Filed 06/25/2003	
on October 21, 2008 Signature/Mirut P. Dalal/	First Named Inventor Mpr				
Typed or printed  NameMirut P. Dalal	Art Unit Exam 2621 Wong				
Applicant requests review of the final rejection in the above-identification with this request.	ed applica	tion. No ame	endme	ents are being filed	
This request is being filed with a notice of appeal.					
The review is requested for the reason(s) stated on the attached sh Note: No more than five (5) pages may be provided.	neet(s).				
I am the		/Mirut P. Dalal/			
applicant/inventor.	-	Signature			
assignee of record of the entire interest.	Mirut P. Dalal				
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)		Typed or printed name			
attorney or agent of record.	(312) 775-8063				
Registration number44,052  attorney or agent acting under 37 CFR 1.34.		Telephone number			
Registration number if acting under 37 CFR 1.34	October 21, 2008				
			Date	,	
NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.					
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This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE Attorney Docket Number 14950US01

In re Application of:	)			
MPR	Electr	onically	File	ed
Serial No.: 10606216	Date:	October	22,	2008
Filing Date: 6/25/2003	)			
Examiner: Wong	)			
Confirmation No.: 3721	) 			
Art Unit No. 2621	) )			
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## REQUEST FOR PRE-APPEAL BRIEF REVIEW

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Dear Sir:

This amendment is filed in response to the Office Action mailed 7/25/2008.

## REMARKS

Claims 1-23 are presently pending and stand rejected. Assignee respectfully requests pre-appeal brief review of the rejections.

Claims 1 and 7 were rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Ozcelik in view of Uz. Claim 1 recites, among other limitations, "writing a second portion of the progressive frame while displaying the first portion of the progressive frame". Claim 7 recites, among other limitations, "a controller for writing a second portion of the progressive frame in the memory, while the display engine displays the first portion".

Examiner has indicated that Ozcelik discloses:

writing a second portion of the frame while displaying the first portion of the frame (col. 12, ln. 19-41); Ozcelik discloses the second portion, ie. bottom field, of the frame written or buffered for storage while the first portion, ie. top field, is displayed). Ozcelik specifically disclose 'progressive not frames'. However, Uz teaches the displaying of progressive frames (col. 4, ln.29-43; and displaying decoding discloses the Therefore, it would have progressive frames). been obvious to one of ordinary skill in the art to combine the teachings of Ozcelik and Us, as a for efficiently displaying high quality progressive video images while reducing noise...

Office Action at 5-6; see also Office Action at 9.

Assignee respectfully traverses the rejection. If the progressive images of Uz were used, it would not be possible for "bottom field of the frame is written or

buffered for storage while the first portion, ie. top field, is displayed". Since the lines of a progressive images are drawn sequentially, it is not possible that the odd-numbered lines, ie., the bottom field of the frame is written or buffered for storage while the even-numbered lines, ie., top field, is displayed.

Accordingly, Assignee respectfully submits that Ozcelik and Uz cannot be combined as proposed by Examiner, teach away from each other, and are inoperable. Accordingly, Assignee respectfully requests that the rejections to claims 1 and 7, and dependent claims 2-6 and 8-14 be reversed.

Claim 13 recites, among other limitations, "no more than 4 megabytes" and "at least 1280x720 resolution". Claim 14 recites, among other limitations, "no more than 8 megabytes", "frame comprises high definition television progressive frames with at least 1920x1080 resolution."

Examiner has indicated that Ozcelik discloses "frames are stored in buffers no more than the seize of 4 megabytes (col. 4, ln. 55-57, note 3X or approximately 3 megabyte is needed for buffering the frame data". Office Action at 11. Examiner has also indicated that "Ozcelik and Uz do not specifically discloses the use of high definition television frames with at least" "1280x720 resolution", "1920x1080". OA at 11; 12. "However, Luna teaches the use high definition television frames with at "1280x720 resolution" "1920x1080". OA at 12. "It would have been obvious to ... use well known term of 'high definition television' ... for viewing clear images for viewing in high definition monitors and televisions so as to enjoy enhanced quality images when watching movies and televised programming." OA at 12.

Assignee respectfully traverses because if Ozcelik and Uz were modified to use high definition television, it would no longer be the case that "3 megabytes is needed for buffering the frame data". It is noted that Ozcelik uses standard NTSC size frames of 720x480 pixels. See Col. 4, Line 41. Clearly when higher resolution frames are used, e.g., 1280x720, or 1920x1080, more memory is required.

Claim 18 was rejected under 35 U.S.C. § 102(b) as anticipated by Ozcelik. Claim 18 recites, among other limitations, "a controller for writing a second portion of the field in the memory, while the display engine displays the first portion of the field". Examiner has indicated that Ozcelik discloses "the second portion, ie, bottom field of the frame is written or buffered while the first portion, ie. top field is displayed." Office Action at 2-3.

Assignee respectfully traverses the rejection. It is noted that claim 18 recites, "second portion of the field" and "first portion of the field", i.e., the "first portion of the field" and the "second portion of the field" claim antecedent basis to the <a href="mailto:same">same</a> field. However, Examiner has indicated that Ozcelik teaches "a controller for writing a second portion of the progressive frame in the memory, while the display engine displays the first portion, ie. top field is displayed." Note that the progressive frame is not a field, and the top field and bottom field are different fields. Accordingly, Ozcelik does not teach "writing a second portion of the field in the memory, while

the display engine displays the first portion of the field".

Accordingly, Assignee respectfully requests that the rejection to claim 18 and dependent claims 19-23.

## CONCLUSION

For at least the foregoing reasons, Assignee respectfully requests pre-appeal review of the rejections of claims 1-14, and 16-23.

Dated: October 21, 2008

Respectfully submitted,

Mirut Dalal

Reg. No. 44,052

Attorney for Applicants

McAndrews, Held & Malloy, Ltd. 500 West Madison Street Chicago, Illinois 60661

Telephone: (312) 775-8000 Facsimile: (312) 775-8100